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NL INDUSTRIES/TARACORP SUPERFUND SITE GROUP

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October 7, 2004

First Class Mail

Mr. Brad Bradley
U.S. Environmental Protection Agency
77 West Jackson Boulevard
Chicago, IL 60604-3590

**RE: NL Industries/Taracorp Superfund Site; Granite City, Illinois
Consent Decree
Progress Report 65 (September 2004)**

Dear Mr. Bradley:

As required by the Consent Decree for the NL Industries/Taracorp Superfund Site (the "site"), two copies of this letter are submitted on behalf of the NL Industries/Taracorp Superfund Site Group ("Group") to provide the U.S. Environmental Protection Agency ("EPA") with a progress report for operation and maintenance activities that were performed during September 2004.

1. Actions Taken During Previous Month to Comply with the Consent Decree:

- On September 2, 2004, the Group's project coordinator issued a progress report to EPA.
- On September 10, 2004, the Group's contractor, ENTACT, remobilized to the site and repaired the erosion areas on the cap of the Taracorp pile. The erosion had occurred following heavy rainfall in the area after ENTACT had initially repaired the erosion in June 2004.
- On September 10, 2004, ENTACT conducted an operation and maintenance inspection at the site on behalf of the Group. A copy of ENTACT's operation and maintenance log sheet, documenting the results of the inspection and the completion of repairs to the erosion areas on the cap of the Taracorp pile, was issued to EPA by the Group's project coordinator on September 20, 2004. The Group's project coordinator also issued a letter to EPA's project manager on September 20, 2004 to provide reproductions of photographs taken by ENTACT to document the completion of erosion repairs to the cap of the Taracorp pile.



- During September 2004, the Madison County Community Development Agency continued to prepare for the public kick-off event related to the implementation of the SEP.
2. **Summary of Data and/or Results of Sampling and Tests Received:**
- Not applicable for this reporting period.
3. **Work Plans, Plans, and Other Deliverables Completed and Submitted to EPA During the Previous Month:**
- Not applicable for this reporting period.
4. **Actions, Data Collection, and Implementation of Work Plans and Other Information Related to the Progress of Construction which are Scheduled to be Performed During the Next Six-Week Period:**
- As reported in previous monthly progress reports, ENTACT remobilized to the site in June 2004 and completed repairs to erosion areas on the Taracorp pile cap. Based upon subsequent information provided by EPA's project manager in August 2004, ENTACT inspected the Taracorp pile cap in August 2004 and determined that heavy rainfall caused the washout of areas on the cap that were repaired in June 2004. As noted above, ENTACT remobilized to the site on September 10, 2004 and repaired the erosion areas.
 - The Madison County Community Development Agency will continue to prepare for a public kick-off event for the SEP. The Group and/or the Madison County Community Development Agency will notify EPA as soon as arrangements for the public kick-off event have been finalized.
 - Upon receipt of "model language" from EPA, the Group will continue efforts to establish institutional controls for the Taracorp pile property.
5. **Problems Encountered, Anticipated Problems, Actual or Anticipated Delays, and Efforts Developed or Implemented to Mitigate Delays:**
- During September 2004, the Madison County Community Development Agency was unable to confirm the availability of the meeting location in Granite City. Accordingly, the public kick-off event for the SEP was not held on September 22, 2004 as previously planned. The Group and/or the Madison County Community Development Agency will notify EPA as soon as arrangements for the public kick-off event have been finalized.

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6. **Modifications to Work Plans or Schedules Proposed to EPA or Approved by EPA:**

- Not applicable for this reporting period.

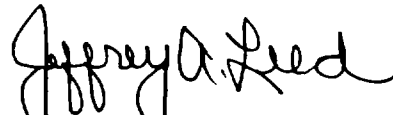
7. **Community Relations Activities During Previous Month or to be Undertaken During Next Six-Week Period:**

- As noted above, the Group anticipates that the Madison County Community Development Agency will continue to plan for the public kick-off event for the SEP.

Should you or your staff have questions or comments regarding this progress report, please contact this office at (610) 670-7310.

Very truly yours,

LEED ENVIRONMENTAL, INC.



Jeffrey A. Leed
Project Coordinator

cc: Ms. Sandra Bron - Illinois EPA (by first class mail)
Mr. Rich Wood - ENTACT, Inc. (by first class mail)
Technical Committee, NL Industries/Taracorp Superfund Site Group
(by first class mail)